

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF VIRGINIA
NORFOLK DIVISION**

THE COLEMAN COMPANY, INC.,

Plaintiff/Counterclaim Defendant,

V.

TEAM WORLDWIDE CORPORATION,

Defendant/Counterclaim Plaintiff

and

CHENG-CHUNG WANG,

Counterclaim Plaintiff.

Civil Action No. 2:20-cv-351-RGD

JURY TRIAL DEMANDED

**TEAM WORLDWIDE CORPORATION'S MOTION FOR SUMMARY JUDGEMENT
OF INVALIDITY OF PLAINTIFF'S U.S. PATENT NO. 7,089,618 AND OF THE
VALIDITY OF DEFENDANT'S U.S. PATENT NO. 6,754,926**

Defendant/Counterclaim Plaintiff Team Worldwide Corporation (“TWW”) hereby moves this Court,¹ pursuant to Fed. R. Civ. P. 56(a) for an Order:

1. granting summary judgment of invalidity of all asserted claims of U.S. Patent No. 7,089,618; and
2. granting summary judgment of no invalidity of the asserted claims of U.S. Patent No. 6,754,926 as to utility under 35 U.S.C. §101 and indefiniteness and best mode under 35 U.S.C. §112.

For the reasons set forth in the accompanying memorandum of law and statement of undisputed material facts, there is no genuine dispute of material fact regarding invalidity of U.S.

¹ Counterclaim Plaintiff Cheng-Chung Wang joins the Motion with respect to summary judgment of the validity of U.S. Patent No. 6,754,926.

Patent No. 7,089,618 or validity of U.S. Patent No. 6,754,926, and summary judgement in favor of TWW on both these issues is appropriate.

Dated: November 10, 2021

Respectfully submitted,

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CERTIFICATE OF SERVICE

I hereby certify that I electronically filed the foregoing on November 10, 2021 with the Clerk of Court using the CM/ECF system, which will send a notification of such filing to all registered users.

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